

**STATE OF CALIFORNIA
REGIONAL WATER QUALITY CONTROL BOARD
CENTRAL COAST REGION**

SUPPLEMENTAL SHEET FOR REGULAR MEETING OF FEBRUARY 17-18, 2022

Prepared on February 16, 2022

ITEM NUMBER: 7

SUBJECT: Revision of Waste Discharge Requirements, Reissuance of National Pollutant Discharge Elimination System Permit No. CA0047961 for San Simeon Wastewater Treatment Plant, San Luis Obispo County, Order No. R3-2022-0003

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KEY INFORMATION: Staff responses to additional comments received and accepted into the administrative record

COMMENTS

The Central Coast Water Board provided a written comment period on the proposed reissuance of the existing National Pollutant Discharge Elimination System (NPDES) permit for the San Simeon Community Services District (Discharger) from December 6, 2021, to January 7, 2022. Two written comment letters were received during the comment period, from the California Coastal Commission and California Department of Fish and Wildlife. The comment letters were accepted into the administrative record at that time and staff responses to significant comments were addressed within the staff report¹ for this item.

Staff received a total of nine late comment letters via email between February 14, 2022, and 12:00pm on February 16, 2022. Two of these letters were submitted by environmental organizations – Cambria Greenspace and Cambria Fishing Club – the remaining seven letters were submitted by individual residents of Cambria. In a pre-

¹ The staff report can be accessed online as part of the agenda notice for the February 17-18, 2022 Central Coast Water Board meeting:
https://www.waterboards.ca.gov/centralcoast/board_info/agendas/2022/feb/item7_stfrpt

hearing ruling, the Chair accepted all nine comment letters into the administrative record.

These comments are related to the optional hauled saline waste program provisions included in the proposed order (section 6.3.6.2, page 19). Each letter addresses the same permit provision and echoes many of the same concerns, and the content of the letters is summarized below. The full text of each comment letter is reprinted in Attachment 1 of this supplemental sheet. The staff responses to significant comments raised in the letter are below.

1. The outfall is located within the Monterey Bay National Marine Sanctuary, the Cambria State Marine Conservation Area/State Marine Park, and a California Marine Protected Area.

Staff Response: Staff is aware that the outfall location is within the Monterey Bay National Marine Sanctuary, the Cambria State Marine Conservation Area/State Marine Park, and a California Marine Protected Area. Staff conducted early outreach to the California Coastal Commission, California Department of Fish and Wildlife, California State Parks, and Monterey Bay National Marine Sanctuary. In response to feedback from these agencies, the permit stipulates that, if the Discharger elects to pursue the hauled saline waste option, the required hauled saline waste study will be reviewed in coordination with each of these agencies through a Technical Advisory Group to ensure the program, if approved by the Executive Officer, is protective of water quality.

2. A proposed discharge of this nature would require multi-agency review.

Staff Response: The hauled saline waste study will be reviewed in coordination with California Coastal Commission, California Department of Fish and Wildlife, California State Parks, and Monterey Bay National Marine Sanctuary through a Technical Advisory Group.

3. No studies have been done.

Staff response: If the Discharger elects to pursue the hauled saline waste option, it must develop and submit a hauled saline waste study which will be reviewed by the multi-agency Technical Advisory Group in coordination with Water Board staff. The study must be approved by the Executive Officer before the discharge of any saline waste would be authorized. The hauled saline waste study must include, at a minimum, the following elements: (1) a projection of the hauled saline waste volume and characteristics, including expectations of variability in discharge quality and quantity over time; (2) an assessment of the impact of the hauled saline waste volume on permit compliance; (3) an assessment of the impact of the hauled saline waste volume on the minimum probable initial dilution at the point of discharge; (4) a detailed description of any hauled saline waste treatment, storage, and disposal facilities that are proposed to accommodate the waste volume and facilitate blending, flow metering, and sampling; (5) a schedule for the design and construction of the new hauled saline waste storage and

disposal facilities; (5) a detailed biological resources assessment; and (6) documentation that the outfall is adequately maintained and structurally sound.

Any blended waste streams made up of secondary-treated effluent and saline waste must meet NPDES permit requirements and comply with the Ocean Plan, meaning the discharge cannot exceed volumes or effluent limitations included in the permit.

4. Outfall condition is poor and has a troubled history.

Staff response: Permit provision 6.3.6.2.2 stipulates that the Discharger must provide documentation that the outfall is adequately maintained and structurally sound before program approval.

5. There is no stated need, justification, or goal for this program. The ocean outfall should be removed when the facility moves.

Staff response: Ocean outfalls are a critical piece of community water supply and wastewater infrastructure that can support water supply augmentation and resiliency projects. As coastal communities throughout the region and state are considering implementing advanced water treatment technologies to meet water supply needs in response to drought, viable options for disposal of water treatment residuals are needed. Disposal via ocean outfall, when all proper precautions and considerations are taken, is an allowable option that is safe and protective of water quality. It can also be a more sustainable option than other disposal options (e.g., hauling).

As such, the goal of the optional hauled saline waste program provisions is to support potential water supply augmentation projects to improve water supply resiliency by creating a more sustainable option for disposal of advanced water treatment residuals. The Central Coast Water Board supports the use of ocean outfalls for this purpose throughout the region.

6. San Simeon Community Services District (CSD) has stated they do not want to accept saline waste from Cambria. Neither San Simeon CSD nor Cambria CSD has approved it.

Staff Response: During early coordination meetings between Water Board staff and the San Simeon CSD, which took place in the fall of 2021 during permit development, San Simeon CSD representatives supported including this option in the permit. The optional program is not specific to Cambria. San Simeon could use it for their own purposes or partner with other jurisdictions to implement this optional program. Both the San Simeon CSD and Cambria CSD were on the interested persons list and did not provide comment related to this permit provision or other provisions during the public comment period. The Water Board encourages communities to consider all potential treatment and disposal options for saline waste and to choose the solution that works best for their community and is protective of water quality.

Additionally, any CSD or jurisdiction that may partner with San Simeon on a saline waste disposal program would need to adhere to any relevant local permitting and associated public process protocols that may apply.

7. The permit states that discharge of effluent without a dilution of 115:1 is prohibited. How would San Simeon be able to generate sufficient wastewater for dilution requirements?

Staff Response: The dilution ratio of 115:1 applies to seawater to effluent (or if approved, blended effluent and saline waste) at the point of outfall discharge into the ocean. The required dilution ratio of secondary treated effluent to saline waste prior to the final point of compliance (Eff-001) would be made known through the hauled saline waste study to ensure compliance with the permit's dilution ratio.

CONCLUSION

The optional hauled saline waste program provisions already address some of the comments received after the public comment period and entered into the record herein. The hauled saline waste program provisions are consistent with statewide priorities in response to climate change induced drought by supporting potential water supply augmentation and resiliency projects.² No permit revisions are recommended.

RECOMMENDATION

No changes to proposed Order No. R3-2022-0003. Adopt the Order as proposed by staff.

ATTACHMENTS

Attachment 1: Full text of comment letters received on February 14 through February 16 (at noon), 2022

² California Water Resiliency Portfolio
<https://resources.ca.gov/Initiatives/Building-Water-Resilience/portfolio>